

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

JOHN TAURO,)	
)	Case No.
Plaintiff,)	
)	JUDGE
v.)	
)	NOTICE OF REMOVAL
BUREAU OF COLLECTION)	
RECOVERY, INC.,)	
)	
Defendant.)	

Now comes Defendant Bureau of Collection Recovery, LLC, incorrectly named Bureau of Collection Recovery, Inc. (“Defendant”), pursuant to 28 U.S.C. §§ 1331, 1441, and 47 U.S.C. § 227, and hereby files this Notice of Removal. Defendant sets forth the following in support hereof:

1. On May 8, 2013, Defendant was served with Plaintiff’s Complaint, a copy of which is attached hereto, in an action entitled, *John Tauro v. Bureau of Collection Recovery, Inc.*, filed of record with the Clerk of the Common Pleas Court of Allegheny County, Pennsylvania, Case No. GD13-7203.

2. Plaintiff’s Complaint purports to set forth a cause of action under 47 U.S.C. § 227.

3. This Court has original jurisdiction over Plaintiff’s cause of action based on 47 U.S.C. § 227, as set forth in 28 U.S.C. § 1331. *See also Mims v. Arrow Financial Services, LLC*, 132 S.Ct. 740, 753 (2012). Pursuant to 28 U.S.C. § 1441, therefore, the civil action pending in the Allegheny County Common Pleas Court, Allegheny County, Pennsylvania, is removable to this Court.

4. Thirty (30) days have not yet expired since receipt of Plaintiff’s Complaint.

5. Copies of all process, pleadings and orders served upon Defendant in this action are attached hereto.

6. Defendant has provided written notice of the filing of this Notice of Removal to Plaintiff's counsel by ordinary mail on this date and has also forwarded a Notice for filing with the clerk of Clerk of the Common Pleas Court of Allegheny County, Pennsylvania, regarding this Notice of Removal.

WHEREFORE, Defendant prays that the above-captioned action now pending in the Clerk of the Common Pleas Court of Allegheny County, Pennsylvania, be removed therefrom and placed on the regular docket of the United States District Court for the Western District of Pennsylvania.

Respectfully submitted,

/s/ Robert J. Hannen

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*Trial Attorneys for Defendant Bureau of Collection
Recovery, LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed on June 7th, 2013, via the Court Clerk's CM/ECF system and served via U.S. first-class mail, postage prepaid, addressed as follows:

Todd M. Friedman, Esquire
Cynthia Z. Levin, Esquire
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/s/ Robert J. Hannen

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